

Exhibit

15

Matthew Holmes Parker June 6, 2005

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4

5 IN THE UNITED STATES DISTRICT COURT

6 FOR THE DISTRICT OF MASSACHUSETTS

7 - - - - - x - - - - -

8 BRAUN GmbH,)

9 Plaintiff,)

10) CIVIL ACTION NO.

11 vs.) 03-CV-12428-WGY

12)

13 RAYOVAC CORPORATION,)

14 Defendant.)

15 - - - - - x - - - - -

16 VIDEOTAPED 30 (b) (6) DEPOSITION

17 OF MATTHEW HOLMES PARKER

18 JUNE 6, 2005 - 7:14 a.m.

19

20 ROPES & GRAY

21 ONE INTERNATIONAL PLACE

22 BOSTON, MASSACHUSETTS

23

24 Reporter: Donna J. Whitcomb, CSR/RPR/RMR

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1 begun the Legalink proceedings following the launch
2 of the rotary system into the United States.

3 Q. Can you tell me again, this coincides with
4 the time you became the business management
5 director?

6 A. Yes, it does.

7 Q. Do you remember what happened first; did
8 you become the business management director and then
9 you learned of the litigation?

10 A. No, the litigation had already begun.

11 Q. At the time that the litigation began did
12 you receive any instructions that you were to retain
13 any documents that you have pertaining to the
14 cleaning system?

15 A. I wasn't given instructions one way or the
16 other.

17 Q. Between the time that you became aware of
18 the litigation and now, have you destroyed any
19 documents pertaining to the cleaning systems?

20 A. No, I have not.

21 Q. Were you asked to search for documents in
22 your files regarding the cleaning systems?

23 A. Recently we were asked to search our
24 e-mail systems for any documents relating to the